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January 30, 2020

VIA ECF

Honorable Judge Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

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Re: Jon R. Morgan v. Living Proof, Inc., Case No. 1:19-cv-07215-RA

To the Hon. Judge Abrams,

We represent Plaintiff Jon R. Morgan ("Plaintiff") in the above-referenced action. Pursuant to Rule 1(B) of Your Honor's Individual Practices, we write jointly with Defense counsel to respectfully request that the Court stay all deadlines including the Initial Conference currently scheduled February 4, 2020 for 45 days, from January 30, 2020 to March 13, 2020, to allow the parties to finalize discussions to affect the voluntary dismissal of all claims asserted in the action. Once finalized, the parties will file a Stipulation of Voluntary Dismissal with the Court.

Respectfully submitted,

/s/ Jonathan Shalom

Jonathan Shalom, Esq.

Attorneys for Plaintiff

APPLICATION GRANTED SO/DRDERED

RONNIE ABRAMS, U.S.D.J.